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November 16, 2020

VIA ECF ONLY

The Honorable Edward S. Kiel, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

RE: Praetorian Insurance Company, a/s/o Raymond Samoroo v. Air Vent, Inc.
U.S.D.C. of New Jersey, No. 18-cv-12314
WCM #122.11228

Dear Judge Kiel:

I write in response to the letter from counsel for Powermax Electrical Co., Ltd. (“Powermax”) dated November 13, 2020. I represent Air Vent, Inc. in the matter and issued jurisdictional discovery to Powermax regarding the sale of its products in the United States, and, more specifically, within New Jersey.

The nineteen requests for production of documents seek, *inter alia*, the following: (1) contracts between Powermax and the companies Powermax works with to sell products in the United States; (2) sales records; (3) marketing and advertising; (4) bills of lading and shipping documents; (5) customer complaints; (6) customer service records, including customer service lines, websites and emails; (7) product recalls; (8) warnings, manuals and packaging; (9) product returns; and (10) warranty claims. The twenty-seven subparts focus specifically on companies with whom we believe Powermax has relationships. Many of the twenty-seven entities listed received products shipped from the Powermax facility in China to the Port in Newark, New Jersey. Since we do not currently know how the contracts with these various companies are structured, we are unable to state whether Powermax also ships products from its facility in China to other ports throughout the United States with the intent to sell the products in New Jersey. Therefore, the requests are drafted in a way that requests “throughout the United States, including New Jersey.” The forty-three Requests for Admission target the shipments from Powermax in China to the Port in Newark, New Jersey.

Although we are not opposed to an extension of time for Powermax to respond to the requests, we do not wish to further delay the case.

Respectfully,

/s/ Jennifer L. Seme

Jennifer L. Seme, Esq.

cc. All Counsel of Record (*via e-mail only*)